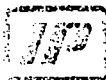




582202

ILLINOIS POWER COMPANY



500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525-1805

0-600391
L04-87(11-30)-L
8D.200

November 30, 1987

Mr. Harry Chappel
Compliance Monitoring Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

1671200015
MORECO / SPRINGFIELD
COMPLIANCE FILE

Dear Mr. Chappel:

The purpose of this letter is to describe two incidents involving the manifesting of waste oil from Illinois Power Company (IPC) facilities to Pierce Waste Oil (MORECO) in Springfield, Illinois: (1) manifesting contaminated waste oil on an expired permit from two Decatur facilities and (2) MORECO's use of generic authorization numbers on manifests.

Manifesting Contaminated Oil from Decatur Facilities on Expired Permits

Waste oil was picked up by Pierce Waste Oil from the Decatur Service Area facility at 2460 North Jasper Street (Illinois Generator I.D. #1150150021) and the Decatur Headquarters facility at 500 South 27th Street (Illinois Generator I.D. #1150150023) on June 30, 1987. The authorization number used on manifest document number 1644100 (Attachment 1) for the 2460 North Jasper Street facility was 992997. The authorization number used for the 500 South 27th Street facility on manifest document number 1644101 (Attachment 2) was 992996. Both authorizations had expired on June 3, 1987. According to Mike Bedolli, the MORECO representative at the Springfield facility, the waste oil was shipped from Springfield (Illinois Facility I.D. #167200015) to the facility in McCook (Illinois Facility I.D. #031174002).

The shipment of waste oil from these two Decatur facilities on expired permits was complicated by another factor. Sample results received on May 28, 1987 from the Jasper Street waste oil tank and on June 30, 1987 from the 27th Street waste oil tank (Attachment 3) indicated that the total chlorine was greater than .1%. The analytical results had been obtained to renew the supplemental waste stream permits.

IPC's Environmental Affairs Department (EAD) immediately notified the Headquarters Service Area Operations staff of the chlorine result and advised them not to allow shipment of the waste oil to Pierce Waste Oil until additional testing was done to determine the source of the chlorine. Further analytical results were obtained on July 7, 1987 (Attachment 4). These results indicated the presence of contaminants, some of which may be listed. When EAD informed Headquarters Service Area Operations staff of the results, it was found that due to a communication problem between Headquarters staff and the service area, the waste oil had already been shipped out on June 30, 1987.

RECEIVED

DEC - 1 1987

IEPA/DIR

Since obtaining the analytical data, IPC has determined the source of the contaminants. Of the contaminants found at detectable levels in the samples, only two, 1,1,1 trichloroethane (detection limit 2.0 ppm) and tetrachlorethene (perchloroethylene) (detection limit 2.0 ppm) are consistent with solvents known to be used by IPC. The solvents were two brake cleaning products. The Material Safety Data Sheets are attached. The source of the other halogenated constituents could not be determined, but the contamination does not appear to be from solvent use. Given the varying nature of waste oil, IPC cannot further evaluate the source of contamination in this waste oil shipment.

To prevent a recurrence of these matters of concern, IP has taken the following steps:

- A. We are reviewing nonchlorinated substitute products (Chemical Industries Formula 0-88) for the currently used cleaner/degreaser.
- B. IP continues to segregate regulated used products from waste oils.
- C. We are pursuing renewal of supplemental waste stream authorizations.
- D. Procedures are being written for service area personnel involved in these activities to ensure their familiarity with proper waste management practices.
- E. The frequency of waste oil testing will be increased from annual to semi-annual.

MORECO's Use of Generic Authorization Numbers

In a separate matter, IP is concerned about and is currently investigating the appropriateness of MORECO's use of generic permits for various IP materials. The facts are as follows:

- o IPC was provided authorization number 000044 by Pierce Waste Oil, Springfield, to cover a shipment of waste crankcase oil from Clinton Power Station. This shipment had been made on June 5, 1987 on manifest #1672551 (Attachment 5).
- o IPC was not aware that authorization number 000044 is not designated for waste crankcase oil until our September 8, 1987 meeting with IEPA. IPC was also not aware, at the time of shipment, that the use of this generic authorization number requires shipment directly to MORECO's McCook facility.
- o IPC requested a copy of the manifest transporting the waste crankcase oil from Pierce (Springfield) to McCook.
- o Per this request, IPC received Illinois manifest form #1715084 (Attachment 6). The authorization number on this manifest appears to be 000049 and the date of shipment from the Springfield facility to the McCook facility is shown as June 23, 1987.

IPC has sent letters dated September 25 and November 2 to MORECO regarding similar manifesting irregularities from other IPC facilities to MORECO's facilities. A copy of both letters was provided to the IEPA. IPC is surprised by MORECO's waste management practices, and we are committed to cooperating with the IEPA in any future investigation.

Sincerely,

ILLINOIS POWER COMPANY



S. Paige Hall
Supervisor - Environmental
Assessment

SPH7:dmf

cc: Larry Eastep - IEPA
Russell Selman - Schiff, Hardin & Waite



Please print or type

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address		Illinois Power Co. 2460 N. Jasper St. Decatur, IL 62526		A. Illinois Manifest Document Number IL 1644100		
4. Generator's Phone (217) 424-7065		6. US EPA ID Number ILD041538687		B. Illinois Generator's ID 1 1 5 01 5 00 21		
5. Transporter 1 Company Name Pierce Waste Oil		8. US EPA ID Number		C. Illinois Transporter's ID 0 1 13		
7. Transporter 2 Company Name		10. US EPA ID Number		D. (217) 528-4271 Transporter's Phone		
9. Designated Facility Name and Site Address Pierce Waste Oil P. O. Box 3063 Springfield, IL 62708		12. Containers No. Type 1 TT		E. Illinois Transporter's ID		
		13. Total Quantity 10.33		F. () Transporter's Phone		
		14. Unit Wt/Vol 1		G. Illinois Facility's ID 1 6 7 12 0 00 1 5		
		15. Facility's Phone (217) 528-4271				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		
a. Used Crankcase Oil		No. Type		14. Unit Wt/Vol		
b.				1. Waste No.		
c.				EPA HW Number		
d.				Authorization Number		
				EPA HW Number		
				Authorization Number		
				EPA HW Number		
				Authorization Number		
				EPA HW Number		
				Authorization Number		
J. Additional Descriptions for Materials Listed Above. Bulk Oil From OUR Tanks		K. Handling Codes for Wastes Listed Above In Item #14 1 = Gallons 2 = Cubic Yards				
15. Special Handling Instructions and Additional Information See IPC Disposal Record Attached						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. practicable						
Printed/Typed Name Bart Idle		Signature <i>Bart Idle</i>		Date 06/30/87		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Bob Roberts		Signature <i>Bob Roberts</i>		
		Signature <i>Bob Roberts</i>		Date 06/30/87		
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		
		Signature		Date		
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name Lisa Lane		Signature <i>Lisa Lane</i>		Date 06/30/87		

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV #6

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111 1/2, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or generator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

Please print or type.

(Form designed for use on elite (12-pitch) typewriter)

EPA Form 8700-22 (3-84)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address		Illinois Power Co. 500 S. 27th St. Decatur, IL 62521				A. Illinois Manifest Document Number IL 1644101			
4. Generator's Phone (217) 424-7065		6. US EPA ID Number ILD041538687				B. Illinois Generator's ID 1 1 5 01 5 00 2 3			
5. Transporter 1 Company Name Pierce Waste Oil		7. Transporter 2 Company Name				C. Illinois Transporter's ID 01 13			
8. US EPA ID Number		9. Designated Facility Name and Site Address Pierce Waste Oil P. O. Box 3063 Springfield, IL 62708				D. (217) 528-4271 Transporter's Phone			
10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				E. Illinois Transporter's ID			
12. Containers		13. Total Quantity				14. Unit Wt/Vol			
15. Special Handling Instructions and Additional Information		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.				K. Handling Codes for Wastes Listed Above In Item #14 1 = Gallons 2 = Cubic Yards			
17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials				19. Discrepancy Indication Space			
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		21. Facility's Phone				22. Facility's ID			

IN ILLINOIS: 217 / 782-3637

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-EV #6

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ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

05-28-87

Received
6/2/87

Sample No.: 46734

Sample Description: DC-87-13 *Decatur Gasper St.*
Waste Crankcase Oil

Date Taken: Unknown

Date Received: 05-11-87 0930

BS & W	<1.	%
BTU	17,000.	/lb
Chlorine, Total (%)	8.09	%
Cyanide, Total	<0.5	ug/g
Sulfide	172.	ug/g
Arsenic	<0.5	ug/g
Barium	7.76	ug/g
Cadmium	2.54	ug/g
Chromium, Total	27.5	ug/g
Lead	121.	ug/g
Mercury	<0.01	ug/g
Selenium	<0.5	ug/g
Silver	<0.05	ug/g
Corrosivity (pH)	6.00	units
Ignitability (Flash Point)	No Flash @ 212	Degree F
Reactive Sulfide	0.48	ug/g

This sample was found to be nonrepresentative since it was taken from an interim container rather than the waste oil tank. The contents of this interim container were eventually poured into the waste oil tank.

S. Paige Hall

William H. Mottashed

William H. Mottashed, Manager
Bartlett Division

Austin Division

2621-130 Ridgepoint Dr.
Austin TX 78754
512-928-8905

Bartlett Division

850 West Bartlett Rd.
Bartlett IL 60103
312-289-3100

Rosner/Runyon Division

222 South Morgan St.
Chicago IL 60607
312-666-4469

Rockford Division

3548 35th St.
Rockford IL 61109
815-874-2171

Corporate Office

850 West Bartlett Rd.
Bartlett IL 60103
312-289-3100



ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

07-07-87

Sample No.: 48020

Received
7/9/87
[Signature]

Sample Description: DC-87-13

Date Taken: Unknown

Date Received: 03-12-87

EP Tox - Cadmium	0.063	mg/L
EP Tox - Chromium	<0.001	mg/L
EP Tox - Lead	0.25	mg/L

William H. Mottashed

William H. Mottashed, Manager
Bartlett Division

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ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

06-30-87

Sample No.: 48087

*Received
7/1/87
[Signature]*

Sample Description: DES-87-14 *Decatur - gasper St*

Date Taken: 06-09-87

Date Received: 06-16-87 1000

BS & W	5	%
BTU	13,100.	/lb
Chlorine, Total (%)	0.7	%
Sulfide	1.5	ug/g
Arsenic	6.4	ug/g
Cadmium	3.54	ug/g
Chromium, Total	6.72	ug/g
Lead	4960.	ug/g
Corrosivity (pH)	7.00	units
Ignitability (Flash Point)	Flash at 110	F
EP Tox - Arsenic	0.002	mg/L
EP Tox - Cadmium	0.183	mg/L
EP Tox - Lead	107.	mg/L

	PCB's	
PCB-1016	<10.	ug/g
PCB-1221	<5.	ug/g
PCB-1232	<5.	ug/g
PCB-1242	<5.	ug/g
PCB-1248	<5.	ug/g
PCB-1254	<10.	ug/g
PCB-1260	<10.	ug/g

Sample taken from waste oil tank

William H. Mottashed
William H. Mottashed, Manager
Bartlett Division

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312-289-3100



ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

07-13-87

Sample No.: 48985

Sample Description: DES-87-14
Old sample #48087

Date Taken: 06-09-87

Date Received: 06-16-87 1000

EP Tox - Chromium

0.022

mg/L

William H. Mottashed, Manager
Bartlett Division

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ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

06-30-87

Sample No.: 48088

Sample Description: DES-87-15 *Decatur - 27th Street*

Date Taken: 06-09-87

Date Received: 06-16-87 1000

BS & W	<1	%
BTU	19,200	/lb
Chlorine, Total (%)	0.3	%
Sulfide	1.5	ug/g
Arsenic	<0.5	ug/g
Cadmium	0.35	ug/g
Chromium, Total	0.50	ug/g
Lead	9.5	ug/g
Corrosivity (pH)	7.00	units
Ignitability (Flash Point)	No Flash at 212	F
EP Tox - Lead	0.28	mg/L

William H. Mottashed
William H. Mottashed, Manager
Bartlett Division

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ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

07-07-87

Sample No.: 48020

Sample Description: DC-87-13 *Decatur - gasper St.*

Date Taken: Unknown

Date Received: 03-12-87

VOLATILE COMPOUNDS

Acrolein	<100.	ug/g
Acrylonitrile	<100.	ug/g
Benzene	<10.	ug/g
Bromodichloromethane	<10.	ug/g
Bromoform	<10.	ug/g
Bromomethane	<100.	ug/g
Carbon tetrachloride	<10.	ug/g
Chlorobenzene	<10.	ug/g
Chloroethane	<100.	ug/g
2-Chloroethylvinyl ether	<10.	ug/g
Chloroform	<10.	ug/g
Chloromethane	<100.	ug/g
Dibromochloromethane	<10.	ug/g
1,2-Dichlorobenzene	<10.	ug/g
1,3-Dichlorobenzene	<10.	ug/g
1,4-Dichlorobenzene	<10.	ug/g
1,1-Dichloroethane	<10.	ug/g
1,2-Dichloroethane	<10.	ug/g
1,1-Dichloroethene	783.	ug/g
cis-1,2-Dichloroethene	<10.	ug/g
trans-1,2-Dichloroethene	<10.	ug/g
1,2-Dichloropropane	<10.	ug/g
cis-1,3-Dichloropropene	<10.	ug/g
trans-1,3-Dichloropropene	<10.	ug/g
Ethyl benzene	<10.	ug/g
Methylene chloride	<50.	ug/g
1,1,2,2-Tetrachloroethane	<10.	ug/g

William H. Mottashed
William H. Mottashed, Manager
Bartlett Division

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ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

07-07-87

Sample No.: 48020

Sample Description: DC-87-13

Date Taken: Unknown

Date Received: 03-12-87

Tetrachloroethene	896.	ug/g
Toluene	73.4	ug/g
1,1,1-Trichloroethane	1430.	ug/g
1,1,2-Trichloroethane	<10.	ug/g
Trichloroethene	<10.	ug/g
Trichlorofluoromethane	<10.	ug/g
Vinyl chloride	<100.	ug/g
Xylenes, Total	108.	ug/g
Freon	<5.0	ug/g

PCB's

PCB-1016	<10.	ug/g
PCB-1221	<5.	ug/g
PCB-1232	<5.	ug/g
PCB-1242	<5.	ug/g
PCB-1248	<5.	ug/g
PCB-1254	<10.	ug/g
PCB-1260	<10.	ug/g

William H. Mottashed
William H. Mottashed, Manager
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ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

06-30-87

Sample No.: 48088

Sample Description: DES-87-15 *Decatur 27th Street*

Date Taken: 06-09-87

Date Received: 06-16-87 1000

VOLATILE COMPOUNDS

Acrolein	<200.	ug/g
Acrylonitrile	<200.	ug/g
Benzene	41.	ug/g
Bromodichloromethane	<20.	ug/g
Bromoform	<20.	ug/g
Bromomethane	<200.	ug/g
Carbon tetrachloride	<20.	ug/g
Chlorobenzene	<20.	ug/g
Chloroethane	<200.	ug/g
2-Chloroethylvinyl ether	<20.	ug/g
Chloroform	<20.	ug/g
Chloromethane	<200.	ug/g
Dibromochloromethane	<20.	ug/g
1,2-Dichlorobenzene	<20.	ug/g
1,3-Dichlorobenzene	<20.	ug/g
1,4-Dichlorobenzene	<20.	ug/g
1,1-Dichloroethane	<20.	ug/g
1,2-Dichloroethane	<20.	ug/g
1,1-Dichloroethene	45.	ug/g
cis-1,2-Dichloroethene	<20.	ug/g
trans-1,2-Dichloroethene	<20.	ug/g
1,2-Dichloropropane	<20.	ug/g
cis-1,3-Dichloropropene	<20.	ug/g
trans-1,3-Dichloropropene	<20.	ug/g
Ethyl benzene	106.	ug/g
Methylene chloride	<100.	ug/g
1,1,2,2-Tetrachloroethane	<20.	ug/g

William H. Mottashed
William H. Mottashed, Manager
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ANALYTICAL REPORT

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

06-30-87

Sample No.: 48088

Sample Description: DES-87-15

Date Taken: 06-09-87

Date Received: 06-16-87 1000

Tetrachloroethene	<20.	ug/g
Toluene	286.	ug/g
1,1,1-Trichloroethane	316.	ug/g
1,1,2-Trichloroethane	<20.	ug/g
Trichloroethene	<20.	ug/g
Trichlorofluoromethane	942.	ug/g
Vinyl chloride	<200.	ug/g
Xylenes, Total	722.	ug/g
Freon ?	166.	ug/g

	PCB's	
PCB-1016	<10.	ug/g
PCB-1221	<5.	ug/g
PCB-1232	<5.	ug/g
PCB-1242	<5.	ug/g
PCB-1248	<5.	ug/g
PCB-1254	<10.	ug/g
PCB-1260	<10.	ug/g

William H. Mottashed, Manager
Bartlett Division

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